

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE: VALE S.A. SECURITIES
LITIGATION

Case No. 15 Civ. 09539 (GHW)

Consolidated with Case No. 16 Civ. 00658
(GHW)

**NOTICE OF LEAD COUNSEL'S MOTION FOR
AN AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

TO: All Counsel of Record

PLEASE TAKE NOTICE that in accordance with Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated February 22, 2020, Lead Counsel will and does hereby move this Court, before the Honorable Gregory H. Woods, on June 10, 2020 at 4:00 p.m. Eastern time, at a hearing to be held telephonically, for entry of an Order awarding attorneys' fees and litigation expenses. The motion is based on (a) the Declaration of Richard D. Gluck in Support of (I) Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation, and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses; (b) the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses; and (c) all other papers and proceedings herein. A proposed Order granting the requested relief will be submitted with Lead Counsel's reply papers after the deadline for objecting to the motion has passed.

Dated: May 6, 2020

Respectfully submitted,

BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP

/s/ John C. Browne

John C. Browne
Gerald H. Silk
Avi Josefson
1251 Avenue of the Americas, 44th Fl.
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
johnb@blbglaw.com
jerry@blbglaw.com
avi@blbglaw.com

-and-

Richard D. Gluck (*Pro hac vice*)
12481 High Bluff Drive, Suite 300
San Diego, CA 92130
Telephone: (858) 793-0070
Facsimile: (858) 793-0323
Rich.Gluck@blbglaw.com

*Counsel for Lead Plaintiffs and Lead
Counsel for the Settlement Class*

#1380220